

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

DEBORAH CHIN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10294 DPW

MICHELLE TREBITSCH, On Behalf Of  
Herself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10307 DPW

INFORMATION DYNAMICS, LLC, On  
Behalf of Itself and All Others Similarly  
Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.  
JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M.  
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10308 DPW

[Additional Captions Follow on Next Page]

**DECLARATION OF MICHAEL T. MATRAIA IN SUPPORT OF JAMES M.  
BROWER'S MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD  
PLAINTIFF, AND FOR APPROVAL OF CHOICE OF LEAD COUNSEL**

PETER KALTMAN, On Behalf of Himself  
and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., RUBEN  
GRUBER, HASSAN AHMED and  
STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10309 DPW

SAMANTHA DEN, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10310 DPW

RICHARD CURTIS, Individually And on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10314 MLW

**[Additional Captions Follow on Next Page]**

RONALD KASSOVER, on Behalf of the  
Ronald Kassover IRA and All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10329 DPW

STEVE L. BAKER, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10333 DPW

MICHAEL KAFFEE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10345 DPW

**[Additional Captions Follow on Next Page]**

HAIMING HU, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-10346 DPW

CHARLES STARBUCK, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10362 DPW

SAMUEL HO, Individually and On Behalf  
of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10363 DPW

**[Additional Captions Follow on Next Page]**

JEFFREY C. RODRIGUES, Individually  
and On Behalf of All Others Similarly  
Situating,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10364 DPW

ROBERT CONTE and MARK RESPLER,  
Themselves and On Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10382 DPW

WHEATON ELECTRICAL SERVICES  
RETIREMENT 401K PROFIT SHARING  
PLAN, On Behalf of Itself and All Others  
Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV-10383 DPW

[Additional Captions Follow on Next Page]

BRIAN CLARK, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., PAUL R.  
JONES, EDWARD N. HARRIS, J.  
MICHAEL O'HARA, HASSAN M.  
AHMED and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10454 DPW

SHEILA BROWNELL, Individually and  
On Behalf of All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN  
AHMED, PH.D. and STEPHEN NILL,

Defendants.

Civil Action No. 04-CV- 10597 DPW

SAVERIO PUGLIESE, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10612 DPW

**[Additional Captions Follow on Next Page]**

DAVID V. NOCITO, On Behalf of  
Himself and All Others Similarly Situated,

Plaintiff,

v.

SONUS NETWORKS, INC., HASSAN M.  
AHMED, and STEPHEN J. NILL,

Defendants.

Civil Action No. 04-CV-10623 DPW

I, Michael T. Matraia, under the pains and penalties of perjury, declare and say:

1. I am a partner with the law firm of Berman DeValerio Pease Tabacco Burt & Pucillo ("Berman DeValerio"), One Liberty Square, Boston, MA 02109, counsel for proposed Lead Plaintiff, James M. Brower. I submit this Declaration in support of Mr. Brower's motion for appointment as Lead Plaintiff and to approve his selection of Lead Counsel.

2. On February 12, 2004, pursuant to Section 78u-4(a)(3)(A)(i) of the Private Securities Litigation Reform Act ("PSLRA"), the law firm of Cauley Geller Bowman & Rudman, LLP caused a press release to be published over PR Newswire, a national business-oriented wire service, notifying members of the proposed class of their right to move to serve as lead plaintiff by no later than sixty (60) days from the date of publication of the notice. The press releases were reprinted verbatim by *Bloomberg Business News*, *Yahoo* and *Westlaw*. Attached hereto as Exhibit A is a true and accurate copy of those notices.

3. PR Newswire is an electronic distributor of corporate, association and institutional news releases to the media and the financial community. PR Newswire distributed the Notices to more than 2,000 different news outlets, including *Bloomberg Business News*, *Dow Jones News Retrieval*, *Associated Press*, and *Reuters*.

4. James M. Brower completed a certification form in accordance with Section 78u-4(a)(3)(B)(iii)(I)(aa) of the PSLRA. Attached hereto as Exhibit B is a true and accurate copy of his certification.

5. The "mean" or average closing price for Sonus Networks, Inc.'s common stock during the period March 27, 2004 through April 8, 2004 was approximately \$3.94 per share. Attached as Exhibit C is a true and accurate copy of the Sonus' common stock price chart for the period March 27, 2004 through April 8, 2004.

6. During the Class Period, James M. Brower suffered losses of approximately \$400,874.88 on his investment in Sonus. Attached as Exhibit D is a table calculating the losses for Mr. Brower in Sonus.

7. A true and accurate copy of Berman DeValerio Pease Tabacco Burt & Pucillo's firm resume is annexed hereto as Exhibit E.

Signed under the pains and penalties of perjury this 12<sup>th</sup> day of April, 2004.

  
Michael T. Matraia